

EXHIBIT B

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Attorneys for Defendant, American Airlines, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

| | | |
|---|---|-----------------------------------|
| Sean Bennett, an individual, |) | Case No. 2:23-cv-02425-ROS--DMF |
| |) | |
| Plaintiff, |) | DECLARATION OF HANNAH |
| |) | BROWN IN SUPPORT OF |
| vs. |) | DEFENDANT AMERICAN |
| |) | AIRLINES' MOTION FOR |
| City of Phoenix, a governmental entity; |) | SUMMARY JUDGMENT |
| American Airlines, Inc., a foreign |) | |
| corporation; Officer Joel Cottrell and Jane |) | Honorable Judge: Roslyn O. Silver |
| Doe Cottrell, a married couple; Officer |) | Magistrate Judge: Deborah M. Fine |
| Benjamin Denham and Jane Doe |) | |
| Denham, a married couple; Officer Todd |) | |
| Blanc and Jane Doe Blanc, a married |) | |
| couple; Officer Peru and Jane Doe Peru, a |) | |
| married couple; Sergeant Hogan and Jane |) | |
| Doe Hogan, a married couple; |) | |
| |) | |
| Defendant(s). |) | |
| |) | |

I, Hannah Brown, declare as follows:

1. I am over the age of eighteen (18) and make this declaration in support of American Airlines' Motion for Summary Judgment. I have personal knowledge

1 of the facts set forth herein and, if called upon, I can and will testify competently as
2 follows:

3 2. On August 13, 2021, I was a ticketed passenger on American Airlines
4 Flight 2391 from Phoenix, AZ, to Anchorage, AK.

5 3. After I boarded the flight, I sat in my pre-selected seat, 28D, and was
6 wearing my noise canceling headphones and listening to music while other
7 passengers were still boarding.

8 4. Through my noise cancelling headphones, I could hear a man shouting
9 on the aircraft. I looked up and saw a male passenger in the row ahead of mine, Row
10 27, speaking with a flight attendant.

11 5. When I removed my headphones, I overheard the flight attendant
12 asking the man to move out of his seat. The man appeared angry and refused to
13 move. He took off his mask and started yelling that he had paid for the seat and was
14 in the military.

15 6. The man loudly identified himself as “Master Seargent” and continued
16 yelling about his military service and being in George Bush’s library. At one point,
17 he yelled that he had killed people before.

18 7. The flight attendants asked the man to exit the aircraft, but he refused
19 and continued to yell and argue. Eventually, another male passenger was able to
20 convince the angry man to deplane and escorted him off the aircraft. He left an
21 empty plastic bar cup in the seat he had been trying to sit in.

22 I declare under penalty of perjury, pursuant to the laws of the United States,
23 that the foregoing is true and correct.

24 Executed this ^{10/15/2025} day of October 2025, in San Diego (City),
25 California (State).

Signed by:

Hannah Brown

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Hannah Brown